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15 **UNITED STATES DISTRICT COURT**  
 16 **NORTHERN DISTRICT OF CALIFORNIA**

17 MARK MORRISON, an individual; ) **Case No: 3:08-CV-1945-EMC**  
 18 Plaintiff, )  
 19 vs. ) **DECLARATION OF MATTHEW  
 20 KURILICH IN SUPPORT OF  
 21 OPPOSITION TO EXTEND CASE  
 22 MANAGEMENT**  
 23 ULI ZANGPO, an individual; )  
 24 Defendants. ) Date: September 10, 2008  
 25 ) Time: 10:30 a.m.  
 26 ) Courtroom: C, 15<sup>th</sup> FLR

27 **DECLARATION OF MATTHEW KURILICH**

28 I, MATTHEW KURILICH, hereby declare under penalty of perjury as follows:

29 1. I, MATTHEW KURILICH, am an attorney at law duly licensed to practice before all courts  
 30 of the State of California. I am a sole practitioner.  
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 32 2. I have personal knowledge of the facts set forth herein, and if called upon to do so, I could  
 33 competently testify to the same.

1 3. I received a phone call from defendant's counsel, Neil Bloomfield (Bloomfield), on May  
2 12, 2008 asking for a 28-day extension to answer the complaint on June 11, 2008 as  
3 Bloomfield stated he had yet to meet with his client and he needed time to answer the  
4 detailed complaint.

5 4. On June 9, 2008, I received a letter from defendant's counsel, Bloomfield, requesting  
6 mediation and binding arbitration.

7 5. On June 10, 2008, I called Bloomfield and had a brief conversation where I granted a  
8 second extension to file an answer and further agreed that I would draft and deliver a  
9 proposed stipulation for binding arbitration, which was completed via email on June 11,  
10 2008 at 1:46 p.m. (Exhibit 1 Email)

11 6. In my telephone discussion with Bloomfield, we did not discuss the motion to dismiss or  
12 the motion to stay.

13 7. I spoke with Bloomfield on 6-20-08 for the purpose of complying with meet and confer  
14 requirements and he was unavailable to speak so we agreed to continue our conversation  
15 later.

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18 Dated: 6-20-08

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20 By: /s/Matthew Kurilich  
Matthew Kurilich,

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1 From: John Crabtree  
2 Subject: **Morrison v. Zangpo**  
3 Date: June 11, 2008 1:46:46 PM PDT  
4 To: Neil Jon Bloomfield  
5 Cc: Matt Kurilich [mattkurilich@yahoo.com](mailto:mattkurilich@yahoo.com), Mark Morrison Law  
> 1 Attachment, 85.0 KB

6  
7 Mr. Bloomfield,

8  
9 At the request of Matt Kurilich and Mr. Morrison, I am forwarding the attached, proposed stipulation, which  
10 includes certain edits dictated to me.

11 If you have any questions, please call Mr. Kurilich. (Please note that I am not counsel for Mr. Morrison).

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John G. Crabtree  
*Florida Bar Board Certified Appellate Lawyer*

**John G. Crabtree, P.A.\***

\*A member of The Florida Appellate Alliance, P.L.C.

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Exhibit 1